

# Steve Harvey Law<sup>LLC</sup>

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August 30, 2021

**Via CM/ECF**

Hon. Jessica S. Allen  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

**Re: *Bank of Hope v. Miye Chon, et al.*  
No. 2:14-cv-01770-KM-JAD**

Dear Judge Allen:

I write in compliance with your letter order of July 8, 2021 (ECF 408), as modified by your order of July 14, 2021 (ECF 411), with this submission of evidentiary materials in support of Crossclaim Plaintiff James S. Ryu's request for a jury to set the amount of damages on the default judgment against Crossclaim Defendant Karen Chon.

Submitted herewith as Exhibit A is an Offer of Proof regarding the points Ryu intends to make at the trial on damages for the default judgment. He seeks compensatory damages consisting of the income he lost and will lose because of the false and defamatory accusation that he had participated in the embezzlement plus compensation for his emotional distress and pain and suffering. He intends to present the testimony of four witnesses to provide an evidentiary basis for the jury's damages determination. Two of these are expert witnesses and their reports are attached as Exhibits B and C hereto.

In addition to these two experts, Ryu will testify and his wife Du Hee Ryu will testify about the pain and suffering Ryu has endured as a result of Chon's false

Hon. Jessica S. Allen  
August 30, 2021  
Page 2

and defamatory accusation against him. They have each executed a declaration regarding their testimony and they are also attached as Exhibits D and E hereto.

I am unable to serve a copy of this letter and the exhibits on Karen Chon, except by ECF, because I do not know where she is and the docket indicates that the mail sent to her by the Court to her last known address (FCI Danbury, CT) keeps getting returned as undeliverable.

Respectfully,



Stephen G. Harvey

Exhibits

- A Offer of Proof
- B Expert Report of Susan Fiester, M.D.
- C Expert Report of Gary Young
- D Declaration of James S. Ryu
- E Declaration of Du Hee Ryu

cc: Michael M. Yi (via email and ECF)  
Kate H. Romick (via email and ECF)  
Allen Wong, Esquire (via email and ECF)  
Naf Kwun, Esquire (via email and ECF)  
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